

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ALABAMA  
MIDDLE DIVISION**

JOHN MILLER,	)	
	)	
Plaintiff,	)	Case No. 4:17-CV-00180
	)	
v.	)	
	)	Hon. Liles C. Burke
JEFFERSON S. DUNN, et al.,	)	
	)	
Defendants.	)	Jury Trial Demanded

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE  
PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT**

Plaintiff, John Miller, respectfully requests that this Court extend the deadline to file his response to Defendants' motion for summary judgment. In support of this motion, Plaintiff states as follows:

1. The Uniform Initial Order governing these proceedings sets the deadline for Plaintiff's response to Defendants' motion for summary judgment as December 3, 2018. Dkt. 29 at 14.
2. The undersigned counsel is responsible for Plaintiff's response to Defendants' motion for summary judgment.
3. Undersigned counsel must prepare for seven depositions in *Hall v. County of Milwaukee*, Case No. 17-cv-379 (E.D. Wis.) No. 17-cv-379 and *Robles*

*v. County of Milwaukee*, Case No. 18-cv-1328 (E.D. Wis.) which are scheduled for the week of December 3, 2018.

4. Undersigned counsel has also been traveling for the recent holiday, placing further restraints on the time available to respond to Defendants' motion.

5. Plaintiff therefore respectfully requests a 14-day extension to file his response to Defendants' motion for summary judgment. This extension would result in a new deadline of December 17, 2018.

6. Plaintiff's counsel has conferred with counsel for Defendants, and they have no objection to this request, provided that Defendants also receive a 14-day extension from December 17, 2018, for reply. This would result in a reply deadline of January 8, 2018.

7. This motion is not brought in bad faith or for the purpose of delay and no party is prejudiced by the proposed extensions.

WHEREFORE, Plaintiff respectfully requests that this Court grant Plaintiff a 14-day extension, until December 17, to file his response to Defendants' motion for summary judgment and grant Defendants a 14-day extension, until January 8, 2018, to file their reply.

Respectfully submitted,

/s/ Theresa Kleinhaus  
Attorney for Plaintiff

Jon Loevy  
Theresa Kleinhaus  
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Roshna Bala Keen  
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**CERTIFICATE OF SERVICE**

I, Theresa Kleinhaus, an attorney, hereby certify that on November 26, 2018, I caused the foregoing Plaintiff's Unopposed Motion for an Extension of Time to File Plaintiff's Response to Defendants' Motion for Summary Judgment to be filed using the Court's CM/ECF system, which effected service on all counsel of record.

Respectfully submitted,

/s/ Theresa Kleinhaus  
Attorney for Plaintiff